

Attachment 1

May 10, 2005 Meeting Agenda

**DIALPAD COMMUNICATIONS, INC.
i2 TELECOM INTERNATIONAL, INC.**

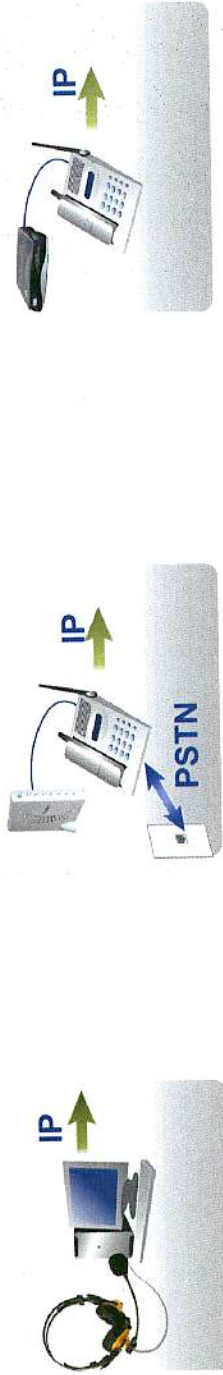
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1. In determining whether to apply E-911 obligations to VoIP providers, the Commission must recognize that there are numerous types of VoIP services. **Depending on the type of service and how it is offered, E-911 service is not always necessary.**
2. Both Dialpad and i2Telecom sell products and services that are meant to serve as second lines. Dialpad's current service offering only allows for users to place VoIP calls. i2 Telecom's VoiceStick requires customers to utilize a computer to place VoIP calls. **In both instances, customers do not have the expectation that they will be able to use either service as a replacement for their existing telephone service.**
3. Dialpad and i2Telecom also sell ATA devices but in each case the device allows for the connection of a traditional telephone line. **When a customer dials 911, the device bridges the call to the traditional telephone line allowing for access to emergency services.**
4. **Neither Dialpad nor i2Telecom market their services as replacement for basic telephone service.** Each company targets consumers of second line telecommunications services.
5. "To the extent – if any – that application of a particular regulatory requirement is needed to further critical national policy goals, **that requirement must be tailored as narrowly as possible**, to ensure that it does not draw into its reach more services than necessary." The Commission must exercise regulatory restraint and specifically target those services that consumers would reasonably rely on as providing access to E-911 services.
6. Second line VoIP services like those offered by Dialpad and i2Telecom **require further examination to determine whether after a cost/benefit analysis** it still makes sense to subject such services E-911 obligations.
7. **The Commission should also encourage innovation in the development of emergency services.** IP-enabled PSAPs would vastly simplify the delivery of E-911 calls from a variety of IP-enabled services, reduce the costs associated with implementing a VoIP E-911 solution, allow for redundancy, and provide a platform for the transmission of richer data to greatly enhance the delivery of emergency services. This goal must not be lost in the VoIP E-911 order.

Attachment 2

Dialpad Presentation on Differentiated VoIP Services

Differentiated VoIP Services



Existing Dialpad Services

Outbound	VoIP	VoIP + PSTN	VoIP
Inbound	None	PSTN	VoIP
911 Service	None	PSTN	VoIP
Access Device	PC and Headset	Telephone	Telephone
Marketed As	Outbound Alternative	Outbound Alternative	Primary Line Replacement
User Expects	No 911	PSTN 911	PSTN 911
Regulatory Need			

Recommendations

- **Functional Equivalence Test Factors:**
 - Inbound Number
 - Does it allow porting of existing inbound numbers?
 - Traditional End User Device
 - Does it use an existing telephone?
 - Consumer Expectation of Equivalence
 - Is it marketed as a “Replacement”?
- **Customer Expectation Test**
 - Would a reasonable person conclude that this service would provide the equivalent of a traditional PSTN 911 service?
- **Market Positioning Test**
 - Does the VoIP service provider market the service in such a way to create the expectation of a traditional 911 service?

Existing Dialpad Services

- **PC to Phone**
 - Description
 - Outbound only
 - PC origination with Headset
 - 911 = None
 - No consumer expectation of 911 service
 - No chance for “confusion”, 5 year old won’t log on to PC to call 911
- **Phone (through ATA) to Phone**
 - Description
 - Outbound only
 - Integrates existing PSTN for 911 services
 - 911 = PSTN 911
 - Works during power outages, network outages, exactly as existing 911
 - Soft “dial-tone” required in CA, NY and VT
 - No expectation of “replacement” service

Dialpad ATA Service with PSTN Integration

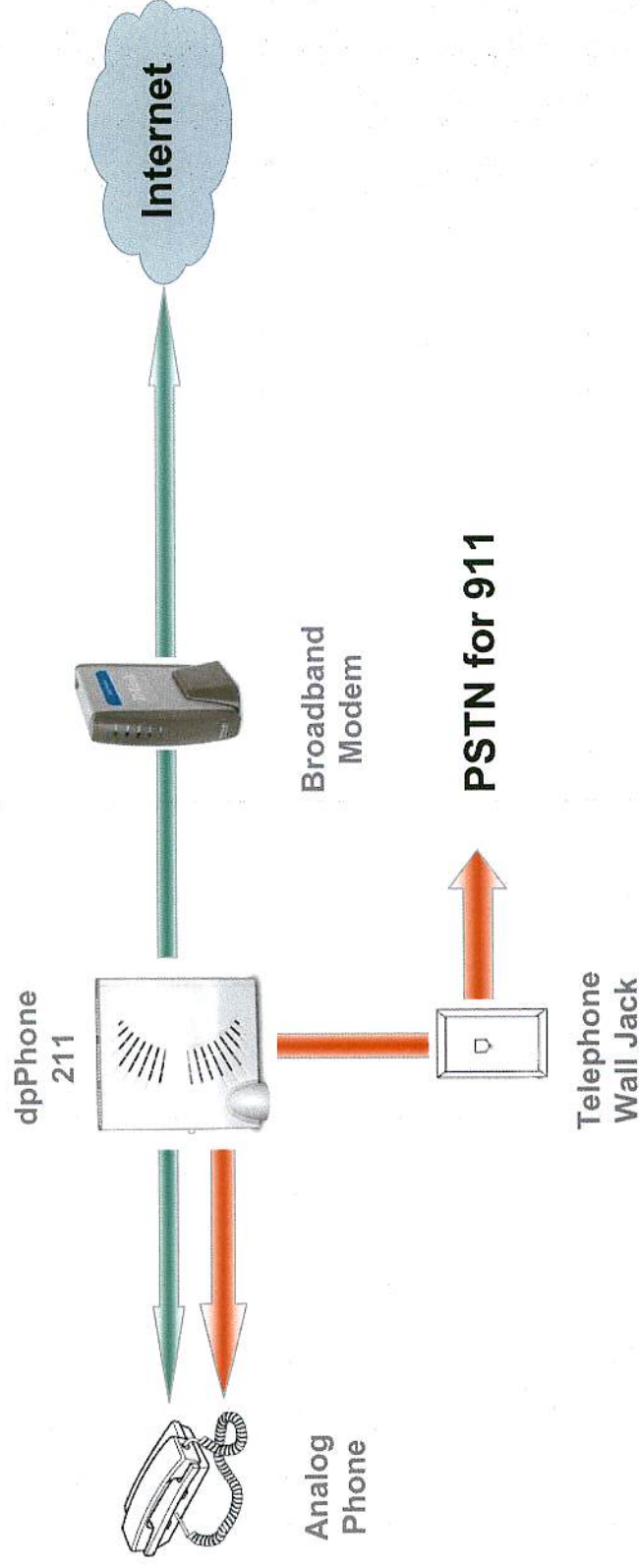
- **The same phone is used for all calls**



Local toll, long-distance and international calls routed through VoIP



911 calls routed through local phone service



Non-Dialpad ATA Service without PSTN Integration

- **The same phone is used for all calls**

➡ All calls routed through VoIP

➡ 911 calls routed through VoIP

